

LAURA CURRAN
County Executive



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**COUNTY OF NASSAU
OFFICE OF THE COUNTY ATTORNEY**

May 26, 2021

Via ECF
Hon. Steven Tiscione
United States District Court
225 Cadman Plaza East
Brooklyn, New York

Re: Besedin v. County of Nassau
18-CV-00819 (KAM)(ST)

Dear Magistrate Judge Tiscione:

This office represents defendants, County of Nassau, the Nassau County Police Department, and Nassau County Police Officers Stephen Beckwith and Dominick Mantovani, in the above-referenced action. The purpose of this letter is (1) to report on the status of discovery; (2) to respectfully request, with the consent of plaintiff's counsel, that the deadline for discovery be extended by 60 days, from May 31, 2021 to July 31, 2021; and (3) that the telephone conference scheduled for June 1, 2021 at 10:00 a.m. be adjourned until after the close of discovery.

Defendants have recently responded to plaintiff's discovery demands. As to the documents recently produced by defendants, plaintiff's counsel is reviewing those documents and reserves all rights to address those documents. Expert reports have been exchanged. However, depositions of plaintiff, the two individual defendants, and of the parties' expert witnesses need to be conducted. As stated, I have received the consent of plaintiff's counsel, Frederick K. Brewington, Esq. to make this application.

Therefore, the parties jointly and respectfully request that the deadline for discovery be extended by 60 days, from May 31, 2021 to July 31, 2021, and that the court telephone conference scheduled for June 1, 2021 be adjourned until after the close of discovery.

As always, the parties thank Your Honor for your attention and consideration in this matter.

Respectfully submitted,

/s/ Ralph J. Reissman
RALPH J. REISSMAN
Deputy County Attorney

cc: Frederick K. Brewington, Attorney for Plaintiff

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